
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie
Nelson, Tannen Maury, and The
Communications Workers of America,
On behalf of themselves and other
similarly situated individuals,

Plaintiff,

v.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo in his
individual and official capacity;
Minneapolis Police Lieutenant Robert
Kroll, in his individual and official
capacity; Minnesota Department of
Public Safety Commissioner John
Harrington, in his individual and official
capacity; Minnesota State Patrol Colonel
Matthew Langer, in his individual and
official capacity; and John Does 1-2, in
their individual and official capacities.

Defendants.

Ct. File No. 20-cv-01302
(WMW/DTS)

**DECLARATION OF
HEATHER ROBERTSON IN
OPPOSITION TO
PLAINTIFF'S MOTION FOR
A PRELIMINARY
INJUNCTION**

Your Declarant is Heather P. Robertson, and she submits the following
declaration on behalf of the Defendant City of Minneapolis:

1. I am an Assistant City Attorney with the Minneapolis City Attorney's
Office. I am one of the attorneys assigned to represent the Defendants City of

Minneapolis and Chief Medaria Arradondo. I submit this declaration in opposition to Plaintiffs' Motion for a Preliminary Injunction.

2. Attached as Exhibit A are the special orders by Chief of Police Medaria Arradondo amending the Minneapolis Police Department Policies relating to civil disturbances and chemical agents, less-lethal munitions, duty to intervene, and MPD Professional Code of Conduct.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Signed in Ramsey County, Minnesota.

Dated: May 26, 2021

/s Heather P. Robertson
Heather P. Robertson